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Drew Wilson*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ADON BANKS,

Plaintiffs,

v.

S/CO LIMA, et al.,

Defendants.

Case No. 2:22-cv-01622-CDS-BNW

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES**

Plaintiff Adon Banks, by and through counsel, Paul S. Padda, and Defendant, Drew Wilson, by and through counsel, Aaron D. Ford, Attorney General for the State of Nevada, and Kyle L. Hill, Deputy Attorney General, hereby stipulate and agree to strike Motion for Extension of Discovery (ECF No. 43) and to extend the current discovery deadline of January 19, 2024 to April 19, 2024.

Plaintiff filed a motion to extend discovery on December 15, 2023, in proper person. (ECF No. 43). However, Plaintiff is now represented by counsel, and parties have discussed the need to continue discovery in order for Plaintiff's recently appointed counsel to familiarize himself with the case. Defendant is not opposed to continuing the discovery deadlines, but because Plaintiff is now represented by counsel, the proper person filing is improper and should be stricken. Therefore, the parties request that the Motion for Extension of Discovery (ECF No. 43) be stricken. Further, the parties request additional time for discovery.

A. Prior Discovery Deadlines

On July 18, 2023, the Court entered a Scheduling Order setting the discovery deadline as January 19, 2024, and dispositive motion deadline for February 19, 2024. (ECF No. 21).

B. Discovery Completed to Date and Description of Uncompleted Discovery.

Initial disclosures were provided by the Defendant on September 12, 2023. Further, the disclosures were supplemented on October 3, 2023. Plaintiff propounded discovery on July 27, 2023, which was responded to by Defendant on October 3rd and 5th of 2023.¹

C. Why Discovery Remains Uncompleted.

Plaintiff's Motion for Appointment of Counsel was granted on October 13, 2023. (ECF No. 37). On November 21, 2023, Mr. Paul Padda was appointed as pro bono counsel for Plaintiff. (ECF No. 42). It is anticipated that counsel for Plaintiff will need time to familiarize himself with the case, and both parties now anticipate the need to serve additional discovery requests.

D. Proposed Discovery Schedule.

The parties have agreed to the following Discovery Plan:

1. Discovery Deadline: Friday, June 21, 2024.
2. Date for filing Dispositive Motions: Monday, July 22, 2024.
3. Motion to Amend Pleadings: Monday, April 22, 2024
4. Expert Disclosures: Monday, April 22, 2024
5. Rebuttal Experts: Wednesday, May 22, 2024

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¹ Defendant acknowledges that these responses were delayed but has already been addressed by the Court via minute order on October 4, 2023. (ECF No. 34).

6. Date for filing the joint pretrial order, unless dispositive motions are filed: Thursday, August 22, 2024. In the event dispositive motions are filed and not granted, the parties agree to submit a proposed joint pretrial order within 30 days of judgment on all dispositive motions.

DATED this 18th day of December, 2023

DATED this 18th day of December, 2023

AARON D. FORD
Attorney General

By: /s/ Paul S. Padda
PAUL S. PADDA, Bar No. 10417
Attorney for Plaintiff

By: /s/ Kyle L. Hill
KYLE L. HILL, Bar No. 16094
Deputy Attorney General

Attorneys for Defendant

The parties' stipulation is **GRANTED** and the Clerk of the Court shall **STRIKE** the Motion to Extend Discovery ECF No. 43.

IT IS SO ORDERED.


US MAGISTRATE JUDGE

DATED: 12/19/2023